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Attorneys for Defendants
State Farm Mutual Automobile Insurance
Company (erroneously sued as State Farm
Mutual, Inc.) and State Farm General Insurance
Company (erroneously sued as State Farm
General Incorporated)

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CARMEL STEVENS and LADALE
JACKSON, individually and on behalf
of all similarly situated,

Plaintiffs,

v.

STATE FARM MUTUAL, INC.;
STATE FARM GENERAL
INCORPORATED and DOES 1
through 50, inclusive

Defendants.

CASE NO. 2:22-cv-06362 FLA (MAAx)

**STIPULATION TO EXTEND TIME
FOR DEFENDANTS TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFFS' COMPLAINT**

Hon. Fernando L. Aenlle-Rocha

Action Filed: July 6, 2022

1 Plaintiffs Carmel Stevens and Ladale Jackson (“Plaintiffs”) and Defendants State
2 Farm Mutual Automobile Insurance Company (erroneously sued as State Farm Mutual,
3 Inc.) and State Farm General Insurance Company (erroneously sued as State Farm
4 General Incorporated) (“Defendants”), by and through their respective counsel, hereby
5 stipulate and agree as follows:

WHEREAS, Plaintiffs filed the above-captioned case in the Superior Court of the State of California for the County of Los Angeles on July 6, 2022;

WHEREAS, per an agreement with Plaintiffs’ counsel, Plaintiffs’ Complaint was served on Defendants on August 6, 2022;

WHEREAS, pursuant to 28 U.S.C. §§ 1332 and 1441, Defendants filed a notice of removal to this Court on September 6, 2022;

WHEREAS, under Federal Rules of Civil Procedure, Rule 81(c)(2)(C), Defendants response to Plaintiffs’ Complaint is due no later than September 13, 2022;

WHEREAS, under Local Rule 8-3, the Parties have entered into a stipulation to extend Defendants’ time to answer or otherwise respond to Plaintiffs’ Complaint by thirty (30) days to October 13, 2022 that is effective upon filing and does not need approval from the Court;

WHEREAS, as detailed in the concurrently filed declaration of Bradley J. Hamburger, the Parties desire to conduct an in-person meeting with Plaintiffs and counsel for both Parties present to discuss Plaintiffs’ allegations in the Complaint before Defendants file their response;

WHEREAS, due to scheduling conflicts, the Parties and their counsel are unable to meet in person until early November 2022;

WHEREAS, the Parties agree it would be most efficient to defer Defendants’ response to Plaintiffs’ Complaint until after the Parties have met in person;

WHEREAS, the Parties have agreed to extend the time for Defendants to file their response to Plaintiffs’ Complaint by an additional thirty-two days from October

1 13, 2022 to November 14, 2022,¹ so as to allow the Parties sufficient time to meet in
2 person regarding the allegations in the Complaint and to provide Defendants with
3 sufficient time to prepare their response to the Complaint;

4
5 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties
through their respective counsel, that Defendants deadline to answer or otherwise
respond to Plaintiffs' Complaint shall be extended to November 14, 2022.

A [Proposed] Order is filed concurrently herewith.

Dated: September 13, 2022

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Bradley J. Hamburger

Bradley J. Hamburger

Attorneys for Defendants State Farm Mutual
Automobile Insurance Company and State Farm
General Insurance Company

Dated: September 13, 2022

DOUGLAS / HICKS LAW, APC

By: /s/ Jamon R. Hicks

Jamon R. Hicks

Attorneys for Plaintiffs Carmel Stevens and
Ladale Jackson

¹ The Parties are seeking an additional thirty-two day extension because a thirty day extension of the October 13 deadline would result in a deadline falling on Saturday, November 12, 2022.

ECF ATTESTATION

Pursuant to Civil Local Rule 5-4.3.4, I, Bradley J. Hamburger, hereby attest that concurrence in the filing of this document has been obtained from Jamon R. Hicks.

Dated: September 13, 2022

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Bradley J. Hamburger
Bradley J. Hamburger